

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case. No.: 20-CR-01707-JAP
	)	
vs.	)	
	)	
THOMAS WABNUM,	)	
	)	
Defendant.	)	

**SEALED MOTION TO UNSEAL CASE**

The United States of America respectfully moves this Court for an order to unseal the above-referenced case and in support states:

1. On September 10, 2020, the grand jury returned an indictment charging the defendant with Aggravated Sexual Abuse and Sexual Abuse in Indian Country, contrary to 18 U.S.C. §§ 1153, 2241(a)(1) and 2246(2)(C) and 18 U.S.C. §§ 1153, 2242(2)(A), and 2246(2)(C).
2. Upon information and belief, the defendant has retained an attorney in connection with the case.
3. An arrest warrant was issued the same day as the indictment.
4. The case, to include the indictment and arrest warrant, were sealed because the defendant had yet to be arrested.
5. As of the filing of this motion, the arrest warrant remains unexecuted.
6. Law enforcement partners have advised that unsealing the case will facilitate the government's ability to speak with the defendant's attorney and to locate the defendant and execute the warrant.

WHEREFORE, the United States respectfully requests that this Court unseal the above-referenced case.

Respectfully submitted,

JOHN C. ANDERSON  
United States Attorney

*Electronically filed on November 13, 2020*

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I HEREBY CERTIFY that on November 13, 2020, I filed the foregoing electronically through the CM/ECF system, which caused all parties to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/

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ALLISON C. JAROS  
Assistant U.S. Attorney